

P. 195

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of
 (Briefly describe the property to be searched
 or identify the person by name and address)
 UNITED STATES PRIORITY MAIL PARCEL
 9505 5148 8228 2078 6668 02

Case No. 2:22-mj-195

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):
 UNITED STATES PRIORITY MAIL PARCEL 9505 5148 8228 2078 6668 02

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds that are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. 841(a)(1)	Possession with intent to distribute a controlled substance
21 U.S.C. 843(b)	Prohibited use of a communication center (U.S. Mail)
21 U.S.C. 846	Conspiracy to possess with intent to distribute a controlled substance

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector Justin D. Koble.

- ☒ Continued on the attached sheet.
☒ Delayed notice of 30 days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


 Applicant's signature

Justin D Koble, US Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 telephone (specify reliable electronic means).

Date: 3/22/2022

City and state: Columbus, Ohio


 Judge's signature

Chelsey M Vascara, U.S. Magistrate Judge

Printed name and title



**AFFIDAVIT IN SUPPORT OF AN APPLICATION
UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Justin D. Koble, being duly sworn, do hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS’s Columbus, Ohio field office. In this capacity, I am responsible for investigating the use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of Title 18, United States Code Sections 1956 and 1957 (money laundering).

2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants which have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center (“P&DC”) involves investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

3. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport illegal drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

4. This Affidavit is made in support of an Application for a search warrant for the following property: a **United States Postal Service (USPS) Priority Mail parcel bearing USPS Tracking Number 9505 5148 8228 2078 6668 02** (hereinafter, the SUBJECT PARCEL).

This Affidavit is made in support of an Application for a warrant to search the SUBJECT PARCEL for, and seize from the SUBJECT PARCEL, evidence of a crime, as well as contraband, fruits of a crime, or other items illegally possessed in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code Section 841;
- b. Use of a Communication Facility, in violation of Title 21, United States Code Section 843(b); and
- c. Conspiracy to Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code Section 846.

5. The facts set forth in this Affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the Application for a search warrant, this Affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On or about March 21, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted the SUBJECT PARCEL at USPS Reynoldsburg Main Post Office, 7185 E Main Street, Reynoldsburg, Ohio 43068. The SUBJECT PARCEL is addressed to “Erin Carter, 2030 Dornbin Dr Apt B, Reynoldsburg, Oh 43068,” with a return address of “KTM Sculpting, 27836 Portal way, Menifee, Ca 92585.” The SUBJECT PARCEL is a white USPS Priority Mail large flat-rate mailing box measuring approximately 12 1/4” x 12 1/4” x 6” and weighing approximately 8 pounds 15.6 ounces. The SUBJECT PARCEL was mailed from the USPS Moreno Valley Main Post Office, 23580 Alessandro Boulevard, Moreno Valley, California 92553, on or about March 19, 2022. The \$21.50 in United States postage affixed to the SUBJECT PARCEL was paid for in cash.



SUBJECT PARCEL
PROBABLE CAUSE

7. Your Affiant has become aware through experience and training that drug traffickers frequently use Priority Mail Express and/or Priority Mail services offered by the USPS, to transport narcotics and other dangerous controlled substances as well as drug proceeds. These services charge a higher fee because they are very timely, reliable and are trackable. However due to the higher fee, these services are not typically used for personal mailings but rather are utilized by commercial mailers and business customers. As they are mostly used for commercial services, they are typically paid for using electronic postage or credit card as opposed to being paid for in cash. Because these services are reliable and trackable, they are often favored by persons who transport contraband and/or illegal controlled substances and drug proceeds. When used for illegal activity, these services are frequently paid for in cash. In my experience and through training, drug traffickers pay for these services in cash so that the transaction cannot be traced to a particular credit card or business account, and because drug trafficking is often a cash business.

8. Also relevant here is the additional characteristic possessed by the SUBJECT PARCEL—namely, the “source state” origination of the parcel. U.S. Postal Inspectors, special agents of the Drug Enforcement Administration (DEA), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio.

9. Further, on or about March 21, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, “27836 Portal way,” was found to be a valid and deliverable address in the 92585 zip code. Checks of law enforcement databases failed to associate the business name “KTM Sculpting” with the above address.

10. On or about March 21, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on the SUBJECT PARCEL. The address, “2030 Dornbin Dr Apt B,” was found to be a valid address in the 43068 zip code, however the name “Erin Carter” was not found to be associated with the address.

11. Based on my experience and training, I know that drug shippers will often list a valid return address with a fictitious name. This is done in an attempt to legitimize the shipment while avoiding detection by law enforcement. A valid recipient’s address is necessary to permit the delivery of such parcels and a fictitious recipient name is frequently used.

12. Because the SUBJECT PARCEL was found to originate in a state known to be a source for controlled substance being mailed to Ohio, the return/destination information was handwritten, the postage for the SUBJECT PARCEL was paid in cash, and the return as well as the recipient names were not found to be associated with the return address, US Postal Inspectors subjected the SUBJECT PARCEL to examination by a drug detecting canine.

EXAMINATION BY CERTIFIED DRUG CANINE

13. On or about March 21, 2022, U.S. Postal Inspectors took custody of the SUBJECT PARCEL from the USPS Columbus, Ohio Main Post Office. The SUBJECT PARCEL is currently located at a secure USPS facility located in Columbus, Ohio.

14. On or about March 22, 2022, U.S. Postal Inspectors contacted Trooper Michael Rucker, Ohio State Highway Patrol, who is the handler for “Max,” a drug detecting canine. “Max” has been certified by the Ohio Peace Officers Training Association since December 2016 for tracking, article search, and the detection of Marijuana, Cocaine, Heroin, Methamphetamine,

and their derivatives. Canine "Max" has over 200 hours of training at the Ohio Highway Patrol K9 Training Facility. Both in training and actual deployments, canine "Max" has successfully detected narcotics; demonstrating clear, passive alerts and establishing himself as a highly reliable police service dog.

15. The SUBJECT PARCEL was hidden among other parcels and Canine "Max" was allowed to search the entire area. Trooper Rucker concluded that "Max" did alert positively and independently to the SUBJECT PARCEL. Based on that alert, Trooper Rucker concluded that the odor of one of the drugs "Max" is trained and certified to detect was present.

CONCLUSION

16. I know based on training and experience that information listed herein identifies common characteristics of a U.S. Postal Service parcel that contains a controlled substance. Based upon my experience and training, this information, along with the parcel being mailed from a location of known drug activity and drug source location is indicative of the parcel containing narcotics.

17. In addition, based upon the information contained in this Affidavit, your Affiant believes that there is probable cause to believe that the parcel described below will contain evidence and/or contraband, fruits of crime, or other items illegally possessed.

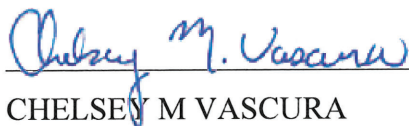
WHEREFORE, your Affiant respectfully requests that the Court issue a warrant, authorizing agents of the USPS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, photograph, and seize, if necessary, the SUBJECT PARCEL and its contents.



Justin D. Koble

U.S. Postal Inspector

Sworn and subscribed to me this 22nd day of March 2022



CHELSEY M VASCURA

UNITED STATES MAGISTRATE JUDGE